

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of

AMENDMENT OF PART 97 OF THE  
COMMISSION'S RULES GOVERNING THE  
AMATEUR RADIO SERVICE TO  
IMPLEMENT CHANGES TO ARTICLE 25  
OF THE INTERNATIONAL RADIO  
REGULATIONS ADOPTED AT THE 2003  
WORLD Radio Communication  
CONFERENCE

RM-10867

Thank you for the opportunity to comment on RM-10867.

I am a licensed amateur radio operator with assigned call sign KC8PUY, a former member of the United States Navy submarine service, a member of the ARRL, and the owner of a small business located in Tiffin, OH, my comments are personal. However, they are based on my experience as an electronics technician, amateur operator and business owner.

I am in general agreement with the principles in RM-10867 and urge the commission to adopt a rule that incorporates these ideas. However, there are a few areas where I respectfully request that the commission deviate from RM-10867.

**1. Element 1 (CW) Testing: *The commission should drop all CW testing requirements for any Amateur Radio Service license.*** Morse code has a long and distinguished history in Amateur Radio, but technology is an ever-evolving entity. The original purposes for CW testing are no longer required from an operational or regulatory standpoint. RM-10867 requests that the present Element 1 test be retained as a requirement for the Amateur Extra Class license. This request serves no regulatory or operational purpose and will complicate the administrative procedures for Amateur Extra class testing and licensing. Sending a message at five words per minute is excruciatingly slow means to convey a meaningful message and is hardly demonstration of proficiency in Morse code. In my opinion it does not represent a level of achievement that the commission should recognize as a requirement for an Amateur Radio Service license, just as the international community no longer requires such a demonstration.

**2. Title of the new entry-level license:** The new entry-level license should have a title that precludes any confusion with the existing or previous license classes. It should not be called Novice, the potential for confusion with two licenses have the same name yet different privileges are obvious. Particularly if existing Novices are not automatically converted to the new entry-level license. ***I recommend Communicator;*** it has been suggested as a name for the new entry-level license. It is different and has never been used before.

The comments below are in support of aspects of RM-10867.

**3. Automatic upgrade:** Novice to new entry class, Technicians to General and Advanced to Extra: RM-10867 and RM 10870 both advocate that existing two Technician classes be upgrade to General as part of this effort and the existing Technician license be abolished. They advocate an identical process for Advanced to Extra.

**4. Call sign assignment for the new entry-level license:** RM-10867 does not explicitly address this issue. I would urge the commission to continue its present call sign assignment structure. The new entry-level licensee should not have a call signs format that is unique to only his/her class of license. To do so would open the door to discrimination towards the new licensee. Unfortunately some amateur operators have been extremely rude to new licensees, with comments such as "Your not a real ham., etc". The world has changed and there is no requirement that a new entry-level licensee ever upgrade.

I respectfully request that you take action on this proposal in a timely manner, as these changes will have a positive impact on amateur radio now and for the future.

Respectfully submitted

**Curtis Robison, KC8PUY  
88 W Market Street  
Tiffin, OH 44883**